Potential SSP Perfluorooctanoic Acid Related Fluoropolymer Materials Obsolescence

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Outline

- Overview
- Chemistry
- Process Overview
- Regulatory/Timeline Drivers
- Implications of Regulatory Language
- Identified Changes to Materials & Processes
- Impacts to NASA
- How We Are Addressing the Issue



Overview

- Perfluorooctanoic Acid (PFOA) is a surfactant used as a processing aid in the production of fluoropolymer and fluoroelastomer materials (PTFE, FEP, PFA, THV, ETFE, HTE, PVDF).
- PFOA has been found in the general population; is biopersistent and a possible carcinogen; and may be linked to other health issues.
- The "Global Stewardship Program for PFOA" is not a traditional EPA regulation but rather an Industrial Agreement.
- The 8 major domestic/international fluoropolymer producers,
 3M/Dyneon, Arkema Inc., AGC Chemicals/Asahi Glass, Ciba
 Specialty Chemicals, Clariant Corporation, Daikin, E.I. duPont de Nemours and Company, and Solvay Solexis, have committed to the Stewardship Program.



Chemistry

Two processes used to produce fluorinated chemicals

- Electrochemical Fluorination (ECF) Majority of fluoropolymers/ fluoroelastomers produced by this method
 - PFOA is usually converted to one of it's salts such as APFO, which serves as a surfactant in the reaction.
- Telomerization Used primarily as paper and fabric protectors
 - PFOA is a byproduct of the Telomerization process.



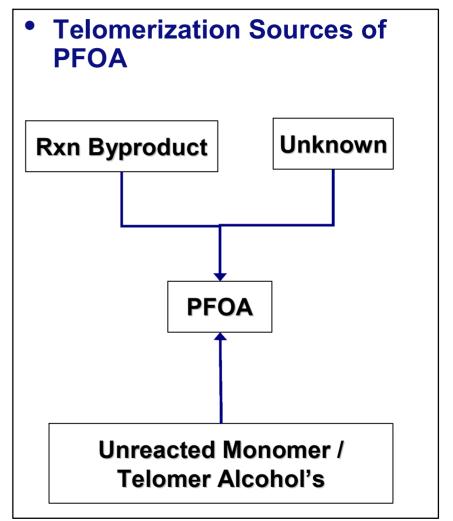
Perfluorooctanoic acid

Ammonium perfluorooctanoate (APFO)



Process Overview

ECF Process PFOA Salt (APFO, ..) **PFAS PTFE PVDF PFOS**





Regulatory/Timeline Drivers

- EPA's Global Stewardship Program for PFOA
 - -"To commit to achieve, no later than 2010, a 95 % reduction, measured from a year 2000 baseline, in both: facility emissions to all media of PFOA, precursor chemicals that can break down to PFOA, and related higher homologue chemicals, and product content levels of PFOA, precursor chemicals that can break down to PFOA, and related higher homologue chemicals".
- EPA Toxic Substances Control Act (TSCA) Section 4, Enforceable Consent Agreements (ECA) and Memorandum of Understanding (MOU) are driving exposure route testing.
- Industrial Phase-out Schedule Most manufacturers are working toward a 90% reduction in their Aqueous Dispersion (AD) lines before CY07.



Implications of Regulatory Language

- "Product Content Levels"
 - Aqueous Dispersions
- "Facility Emissions to All Media"
 - Process Efficiency / Byproducts / Waste
- ECAs and MOUs
 - Testing of breakdown products and exposure routes
 - Telomers are suspect





Identified Changes to Materials Processes

- Aqueous Dispersions (2 different routes of reduction)
 - Additional processing a final wash step to remove PFOA and replace with a different surfactant
 - Reformulation Replacing PFOA in the reaction step
- Elastomers (small amounts of PFOA in the final product)
 - Reformulation Replacing PFOA in the reaction step
- Polymers (i.e. plastics)
 - No changes identified at this time.
- Fluorotelomers
 - No changes identified at this time.



Impacts to NASA

- The SSP was informed that the beta cloth used to make payload bay thermal control blankets would be reformulated in September '06.
- The SSP has identified multiple flight hardware and tooling dispersion coatings on the Dupont CY06 reformulation list.
- The International Space Station (ISS) identified Teflon T30 used in batteries as a catalyst binder as reformulated in December '05 with a 6 month shelf life.
- NASA could have potential impacts in coatings, tapes, insulations, tubing, thread packing materials, cables/wires, and seals/o-rings.





How We Are Addressing the Issue

- NASA formed a team to assess the PFOA Impacts to the SSP
 - Composed of SSP and Air Force Space Command representatives
 - -Working to determine the integrated SSP risk associated with the PFOA Global Stewardship Program and develop a mitigation plan. Team is working to identify materials subject to reformulation.
- NASA formed a team to assess the PFOA Impacts to the ISS
 - -Team composed of ISS and SSP representatives
 - -Working to identify critical ISS applications of fluoropolymer materials with reformulation or process change potential. Current focus is on DuPont (Largest producer of PTFE and Fluoromer blends "TeflonTM").
- Teams are working together to identify commonality and integrate efforts where possible.



Questions?





Backup

- Definitions
- Polymer Acronyms



Definitions

- Higher Homologue Chemicals: PFOA is an eight-carbon chain length chemical. Chemicals similar in structure to PFOA but with nine or more carbons in the chain would be higher homologues of PFOA.
- Precursor: A chemical that can break down to form another chemical, in this case, PFOA. For example, some residual monomer chemicals from the telomer manufacturing process such as telomer alcohols and telomer iodides may remain in the final product and break down into PFOA.
- Aqueous Dispersions: A liquid system in which very small solid particles (in this case fluoropolymer) are uniformly dispersed in water.
- Surfactant: A substance capable of reducing the surface tension of a liquid in which it is dissolved. It tends to dissolve in both the aqueous and oil phase and to locate at the oil-water interface.



Polymer Acronyms

- PTFE polytetrafluoroethylene
- FEP fluorinated ethylene-propylene
- PFA perfluoroalkoxy
- THV tetrafluoroethylene, hexafluoropropylene and vinylidene fluoride
- ETFE ethylene tetrafluoroethylene
- HTE hexafluoropropylene, tetrafluoroethylene, and ethylene
- PVDF polyvinylidine difluoride or polyvinylidene fluoride

